

## EXHIBIT A

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14 Defendant SHAKEY'S PIZZA ASIA  
15 VENTURES, INC. and Third Party Defendants  
16 CINCO CORPORATION, PC  
17 INTERNATIONAL PTE LTD., and SPAVI  
18 INTERNATIONAL USA, INC.

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**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

19 SHAKEY'S PIZZA ASIA VENTURES,  
20 INC, a Philippines corporation,

21 Plaintiff,

22 v.

23 PCJV USA, LLC, a Delaware limited  
24 liability company; PCI TRADING,  
25 LLC, a Delaware limited liability  
26 company; GUY KOREN, an individual;  
27 POTATO CORNER LA GROUP, LLC,  
28 a California limited liability company;  
NKM CAPITAL GROUP, LLC, a  
California limited liability company;  
J & K AMERICANA, LLC, a California  
limited liability company; J&K  
LAKEWOOD, LLC, a California  
limited liability company; J&K  
VALLEY FAIR, LLC, a California  
limited liability company; J & K  
ONTARIO, LLC, a California limited  
liability company; HLK MILPITAS,  
LLC, a California, limited liability  
company; GK CERRITOS, LLC, a  
California, limited liability company;  
J&K PC TRUCKS, LLC, a California

Case No. 2:24-CV-04546-SB(AGRx)

*The Hon. Stanley Blumenfeld, Jr.*

**JOINT STATEMENT OF  
STIPULATED FACTS**

Complaint Filed: May 31, 2024

Trial Date: August 18, 2025

1 limited liability company; and, GK  
2 CAPITAL GROUP, LLC, a California  
3 limited liability company and DOES 1  
through 100, inclusive,

4 Defendants.

5 PCJV USA, LLC, a Delaware limited  
6 liability company; PCI TRADING LLC,  
7 a Delaware limited liability company;  
POTATO CORNER LA GROUP LLC,  
8 a California limited liability company;  
GK CAPITAL GROUP, LLC, a  
9 California limited liability company;  
NKM CAPITAL GROUP LLC, a  
California limited liability company; and  
GUY KOREN, an individual,

10 Counter-Claimants,

11 v.

12 SHAKEY'S PIZZA ASIA VENTURES,  
13 INC, a Philippines corporation,

14 Counter Defendant.

15 PCJV USA, LLC, a Delaware limited  
16 liability company; PCI TRADING LLC,  
17 a Delaware limited liability company;  
POTATO CORNER LA GROUP LLC,  
18 a California limited liability company;  
GK CAPITAL GROUP, LLC, a  
19 California limited liability company;  
NKM CAPITAL GROUP LLC, a  
California limited liability company; and  
GUY KOREN, an individual,

20 Third Party Plaintiffs,

21 v.

22 PC INTERNATIONAL PTE LTD., a  
Singapore business entity; SPAVI  
INTERNATIONAL USA, INC., a  
23 California corporation; CINCO  
CORPORATION, a Philippines  
corporation; and DOES 1 through 10,  
24 inclusive,

25 Third Party Defendants.

1 Pursuant to Dkt. No. 254, the parties submit the following joint statement  
2 setting forth the facts to which all parties can stipulate for trial.  
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1. Shakey's Pizza Asia Ventures, Inc. ("SPA VI") is a publicly traded  
2 food services corporation headquartered in the Republic of the  
3 Philippines.
4. In 1992, four individuals—Jose Magsaysay Jr. (also known as  
5 "JoMag"), Ricky Montelibano, Danny Bermejo, and George Wieneke,  
6 originally operating under Quattro Corporation and later under Cinco  
7 Corporation ("Cinco")—established the Potato Corner brand in the  
8 Philippines.
9. JoMag serves as the CEO of Cinco.
10. PCJV USA, LLC ("PCJV") is a Delaware limited liability company  
11 operating in the United States.
12. PCJV stands for "Potato Corner Joint Venture."
13. As a result of a 2024 settlement, PCJV is wholly owned by Guy Koren  
14 through his entities (Potato Corner LA Group, LLC and GK Capital  
15 Group, LLC).
16. PCJV was established in 2010 to serve as the master franchisor of  
17 Potato Corner restaurants in the United States.
18. Each Potato Corner franchised restaurant in the United States obtained  
19 its rights to use Potato Corner marks from PCJV.
20. PCI Trading LLC ("PCIT") is a Delaware limited liability company  
21 operating in the United States.
22. PCIT managed the supply chain within the United States.
23. Similar to PCJV, as a result of a 2024 settlement, PCIT is now wholly  
24 owned by Guy Koren (individually and through GK Capital Group,  
25 LLC).

12. Beginning in 2010, Cinco filed applications to register certain marks
13. with the United States Patent and Trademark Office (“USPTO”).
14. Those applications included an application to register a Potato Corner
15. logo mark, a Potato Corner word mark, and a slogan mark.
16. The USPTO issued registrations for the marks.
17. Potato Corner LA Group, LLC is a California limited liability
18. company owned by Guy Koren.
19. GK Capital Group, LLC is a California limited liability company
20. owned by Guy Koren.
21. NKM Capital Group, LLC is a California limited liability company,
22. partly owned by Guy Koren, and operates two franchise locations at
23. The Shops at Santa Anita Mall in Arcadia, California.
24. J & K Americana, LLC is a California limited liability company, partly
25. owned by Guy Koren, and operates a franchise location at The
26. Americana at Brand in Glendale, California.
27. J&K Lakewood, LLC is a California limited liability company, partly
28. owned by Guy Koren, and operates a franchise location at Lakewood
29. Center in Lakewood, California.
30. J&K Oakridge, LLC is a California limited liability company, partly
31. owned by Guy Koren, and is not currently operating.
32. J&K Valley Fair, LLC is a California limited liability company, partly
33. owned by Guy Koren, and operates a franchise location at Westfield
34. Valley Fair in Santa Clara, California.
35. J & K Ontario, LLC is a California limited liability company, partly
36. owned by Guy Koren, and operates a franchise location at Ontario
37. Mills in Ontario, California.
38. J&K PC Trucks, LLC is a California limited liability company, partly
39. owned by Guy Koren, and is not currently operating.

- 1        24. HLK Milpitas, LLC is a California limited liability company, partly
- 2                  owned by Guy Koren, and operates a franchise location at Great Mall
- 3                  Milpitas in Milpitas, California.
- 4        25. GK Cerritos, LLC is a California limited liability company, partly
- 5                  owned by Guy Koren, and operates a franchise location at Los Cerritos
- 6                  Center in Cerritos, California.
- 7        26. Potato Corner International PCE Ltd is a Singapore-based corporation
- 8                  affiliated with SPAVI.
- 9        27. SPAVI International USA, Inc. is a Delaware limited liability
- 10                 company affiliated with SPAVI.
- 11       28. SPAVI established SPAVI International USA, Inc. in 2024 to expand
- 12                 the Potato Corner brand in the United States.

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14 Dated: August 12, 2025

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*/s/ Michael D. Murphy*

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16 Michael D. Murphy

17 Matthew Follett

18 Jessica Nwasike

19 Fox Rothschild LLP

20 *Attorneys for Plaintiff and*

21 *Counterclaim Defendant, and Third*

22 *Party Defendants*

23

24 Dated: August 12, 2025

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*/s/ Arash Beral*

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26 Arash Beral

27 Todd M. Malynn

28 Blank Rome LLP

*Attorneys for Defendants,*

*Counterclaimants, and Third Party*

*Plaintiffs*

**CERTIFICATE OF SERVICE**

The undersigned certifies that, on August 12, 2025, the foregoing document was electronically filed with the Clerk of the Court for the United States District Court, Central District of California, using the Court's ECF filing system. I further certify that all counsel for all parties to this action are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: August 12, 2025

FOX ROTHSCHILD LLP

*/s/ Michael D. Murphy*

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Michael D. Murphy  
Attorneys for Plaintiff and Counterclaim  
Defendant SHAKEY'S PIZZA ASIA  
VENTURES, INC. and Third Party  
Defendants CINCO CORPORATION,  
PC INTERNATIONAL PTE LTD., and  
SPAVI INTERNATIONAL USA, INC.